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US BANKRUPTCY COURT
DISTRICT OF DELAWARE

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX Trading Ltd., et al., Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Claim #60161, Schedule # 6794905

EMERGENCY MOTION OF LIU JING

TO REQUIRE THE FTX RECOVERY TRUST TO PROVIDE A WRITTEN EXPLANATION OF “DISPUTED” STATUS BY SEPTEMBER 29, 2025, AND IF NO GOOD CAUSE IS SHOWN, TO DIRECT INCLUSION IN THE SEPTEMBER 30, 2025 DISTRIBUTION, OR, IN THE ALTERNATIVE, TO ESTABLISH A RESERVE; AND TO SHORTEN NOTICE

I. INTRODUCTION AND RELIEF REQUESTED

Movant, Liu Jing (“Movant”, Claim #60161, Schedule # 6794905), a creditor of the Debtors, respectfully submits this emergency motion (the “Motion”) seeking narrowly tailored relief to prevent irreparable harm with respect to the imminent September 30, 2025 distribution under the confirmed Plan.

Despite having timely updated residency and tax information to reflect Singapore residency prior to the August 15, 2025 distribution snapshot, and despite having confirmed with the Distribution Service Provider (“DPS,” Kraken) that the DPS connection was successfully completed and verified, Movant’s account remains incorrectly flagged as “disputed” on the FTX Recovery Trust dashboard.

As a result, Movant has been excluded from the September 30 distribution. Multiple written requests to support@ftx.com have yielded only template replies, without any substantive explanation.

Accordingly, Movant requests that this Court enter an order: (i) requiring the FTX

Recovery Trust to provide, no later than September 29, 2025, via written notice and email to Movant's address at bitcoinistwill@gmail.com, a specific factual and legal explanation for the "disputed" designation; (ii) directing inclusion of Movant in the September 30, 2025 distribution if no good cause is timely shown; or, in the alternative, (iii) requiring the establishment of a reserve equal to the distribution otherwise payable to Movant, to be promptly released upon resolution of the dispute.

Given the imminent distribution deadline, Movant further requests that the Court shorten notice and schedule this Motion for emergency consideration pursuant to Del. Bankr. L.R. 9006-1(e).

II. JURISDICTION AND VENUE

This Court has jurisdiction pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

The statutory and Plan-based authority for the relief requested herein includes 11 U.S.C. §§ 105(a) and 1142(b), and the Court's retained jurisdiction under the confirmed Plan.

III. FACTUAL BACKGROUND

Movant resides in Singapore and holds a PRC passport. Singapore is not a "Restricted Jurisdiction" under the Plan.

Prior to the August 15, 2025 snapshot, Movant corresponded with FTX to confirm residency and tax information had been updated to Singapore residency, and received confirmation.

Movant also contacted the DPS (Kraken) and received email confirmation that the DPS account was successfully connected.

Nevertheless, the dashboard continues to reflect Movant's account as "disputed," excluding Movant from the distribution.

Multiple requests to support@ftx.com produced only template responses. If relief is

not granted, Movant will irretrievably lose access to the current distribution cycle and suffer uncompensable prejudice.

IV. LEGAL BASIS FOR RELIEF

Implementation of Plan (§1142(b)): The confirmed Plan requires faithful implementation of the distribution procedures. This Court has authority to compel the Trust to take actions necessary to effectuate the Plan.

Equal Treatment (§1123(a)(4)): Creditors within the same class must receive equal treatment. Excluding Movant, a Singapore-based creditor with a verified DPS connection, without justification violates this requirement.

Due Process: A creditor cannot be deprived of a distribution right without notice of the factual and legal basis of the dispute.

Equitable Relief (§105(a)): This Court may issue equitable orders, including requiring a reserve, to prevent imminent and irreparable harm.

V. RELIEF REQUESTED

WHEREFORE, Movant respectfully requests that the Court enter an order:

- a. Requiring the FTX Recovery Trust to provide to Movant, in writing and by email to [Movant's Email Address], no later than September 29, 2025, a specific factual and legal explanation for the "disputed" designation;
- b. If no good cause is shown by that deadline, directing the FTX Recovery Trust to include Movant in the September 30, 2025 distribution;
- c. In the alternative, directing the FTX Recovery Trust to immediately establish a reserve equal to the distribution otherwise payable to Movant, to be promptly released upon resolution of any dispute;
- d. Granting such other and further relief as the Court deems just and proper.

VI. CERTIFICATION OF EFFORTS TO RESOLVE

MOTION TO SHORTEN NOTICE

Pursuant to Del. Bankr. L.R. 9006-1(e), Movant respectfully requests that the Court shorten the notice period for this Motion. The September 30, 2025 distribution is imminent. Absent expedited consideration, Movant will be irreparably harmed by being excluded from the upcoming distribution cycle. The relief requested herein is narrow, targeted, and time-sensitive. Movant therefore requests that the Court schedule this Motion for hearing on shortened notice, or in the alternative, determine the Motion on the papers without a hearing prior to September 30, 2025.

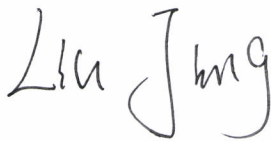
Movant made multiple written attempts to resolve this matter by contacting support@ftx.com but only received automated template responses.

VII. CONCLUSION

Movant respectfully requests expedited consideration of this Motion to prevent irreparable harm.

Dated: September 26, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Liu Jing". The signature is written in a cursive, flowing style.

Liu Jing (Pro Se)

Email: bitcoinistwill@gmail.com

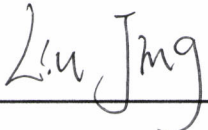
DECLARATION OF LIU JING

I, Liu Jing, declare as follows:

1. I am the Movant in the foregoing Motion.
2. Prior to August 15, 2025, I updated my residency and tax information with FTX to reflect Singapore residency, and received confirmation.
3. I connected with the DPS (Kraken) and received email confirmation that the connection was successful.
4. My account is nevertheless shown as "disputed," excluding me from the September 30 distribution.
5. I contacted support@ftx.com multiple times, but received only template replies.
6. Attached as Exhibits A–E are true and correct copies of the referenced documents.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 26, 2025.



Liu Jing

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DISTRICT OF DELAWARE

PROPOSED ORDER

Upon consideration of the Emergency Motion of Liu Jing (the “Motion”); IT IS
HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. No later than September 29, 2025, the FTX Recovery Trust shall provide to Movant, in writing and by email to bitcoinistwill@gmail.com, a specific factual and legal explanation for the “disputed” designation.
3. If no good cause is shown by that deadline, the FTX Recovery Trust is DIRECTED to include Movant in the September 30, 2025 distribution.
4. In the alternative, the FTX Recovery Trust shall immediately establish a reserve equal to the distribution otherwise payable to Movant.
5. The Court retains jurisdiction to enforce and interpret this Order.

Dated: _____, 2025

Hon. Karen B. Owens

United States Bankruptcy Judge

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CERTIFICATE OF SERVICE

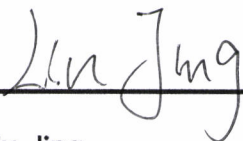
I, Liu Jing, hereby certify that on September 26, 2025, I caused a copy of this Motion to be served via email upon the following parties listed below.

CLERK
BANKRUPTCY COURT
DISTRICT OF DELAWARE

- Counsel for the FTX Debtors — Sullivan & Cromwell LLP
 - James L. Bromley — bromleyj@sullcrom.com
 - Alexa J. Kranzley — kranzleya@sullcrom.com
 - Andrew G. Dietderich — dietdericha@sullcrom.com
 - Brian D. Glueckstein — gluecksteinb@sullcrom.com
- Local Counsel — Landis Rath & Cobb LLP
 - Adam G. Landis — landis@lrclaw.com
 - Kimberly A. Brown — brown@lrclaw.com
 - Matthew R. Pierce — pierce@lrclaw.com
- Office of the United States Trustee
 - Juliet M. Sarkessian — juliet.m.sarkessian@usdoj.gov
 - Benjamin A. Hackman — benjamin.a.hackman@usdoj.gov
 - David Gerardi — david.gerardi@usdoj.gov

I certify under penalty of perjury that the foregoing is true and correct.

Dated: September 26, 2025



Liu Jing

EXHIBIT INDEX

Exhibit A — Screenshot of Movant's FTX Customer Claim Portal marked "Disputed"
(Sept. 26, 2025)

Exhibit B — Email from FTX Support confirming completion of KYC verification(July.
31, 2025)

Exhibit C — Email from Kraken confirming DSP onboarding (Aug. 7, 2025)

Exhibit A — Screenshot of Movant's FTX Customer Claim Portal marked "Disputed"
(Sept.26,2025)

STEP 1
Initiate Account Owner Authentication

STEP 2
Verify Identity of the Original FTX Account Owner

STEP 3
KYC

STEP 4
View Account Balances

STEP 5
View Your Proof of Claim Status

STEP 6
Voting

STEP 7
Distributions - Tax Requirements

STEP 8
Distributions: Select Provider

STEP 9
Distribution Amounts - Summary

Distributions Dashboard

Values in U.S. Dollars (USD)

Distributions to Date - Non-Convenience Class Customers

Sep 30th Distribution - Non-Convenience Class Customers

| | | |
|------------------------|----------|--|
| Distribution Method | Kraken | |
| Est. Distribution Date | TBD | |
| Claim Classification | TBD | |
| Claim Status | Disputed | |

Distribution Calculation

| | | |
|-------------------------------------|------------|--|
| Claim Amount | TBD | |
| Principal Recovery % | TBD | |
| Total Principal Recovery | TBD | |
| Post-Petition Interest Distribution | TBD | |
| (Tax Withholding) | TBD | |

Exhibit B — Email from FTX Support confirming completion of KYC verification(July. 31, 2025)



FTX Support <support@ftx.com>

to me ▾

##- Please type your reply above this line -##

Your request (328465) has been updated.

To add additional comments, reply to this email.



Philip (Please use support@ftx.com)

Jul 31, 2025, 00:53 PDT

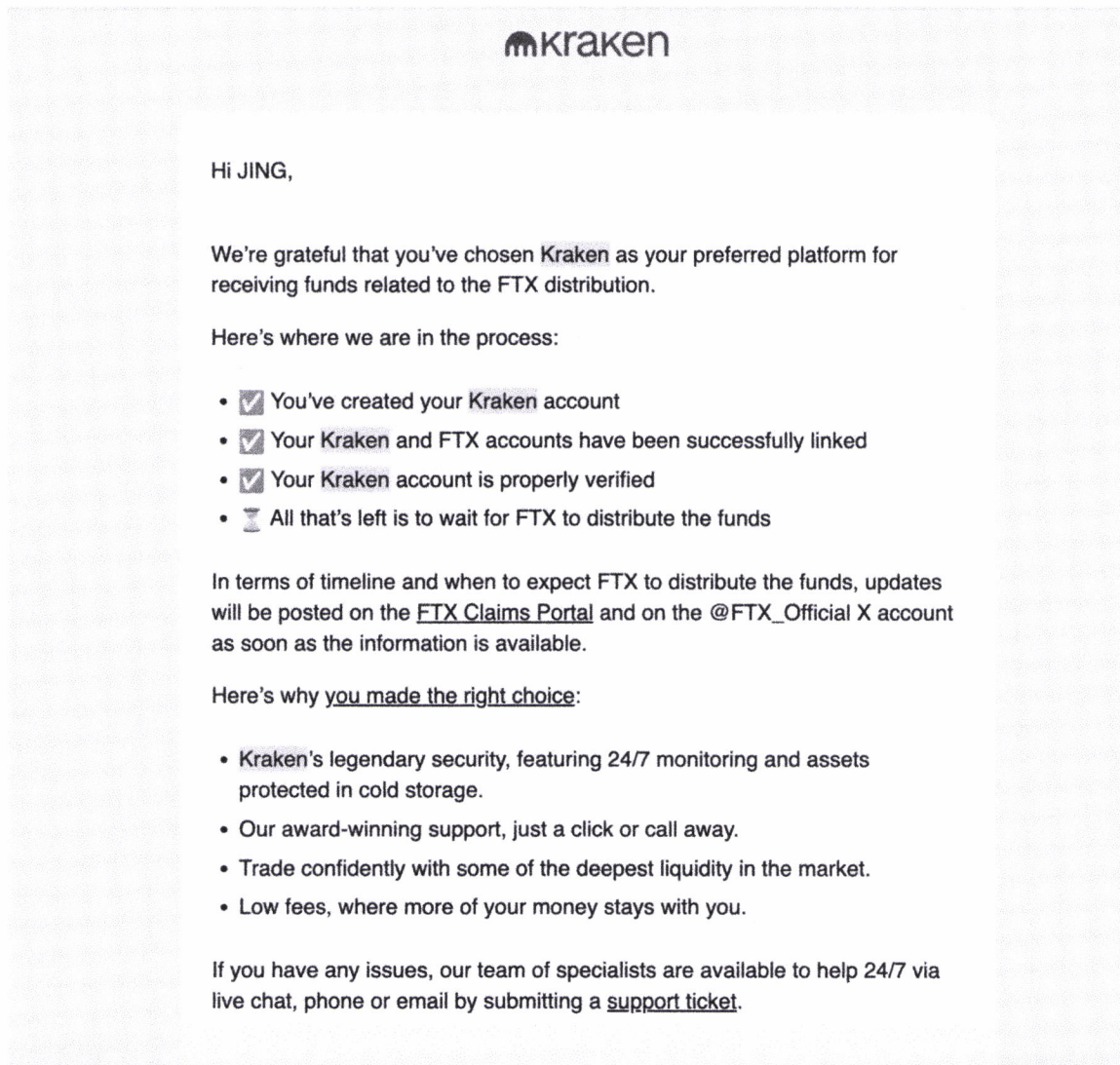
Hello,

Your KYC has been updated by the team.

Thanks,

FTX Customer Support

Exhibit C — Email from Kraken confirming DSP onboarding (Aug.7,2025)



EXPRESS 12:00

T D T



2025-09-26 MYDHL + 1.0 / *30-0821*

From : Weiwel Ji
WEIWEIJI
916 Sims Avenue
#07-78

Origin:
SIN

408974 SINGAPORE SINGAPORE
Singapore

To : the United States Bankruptcy Court, District of Delaware
Clerk, US Bankruptcy Court
WILMINGTON, DE
824 North Market Street, 3rd Floor

19801 WILMINGTON Delaware
United States of America

US-PHL-NJS DENU

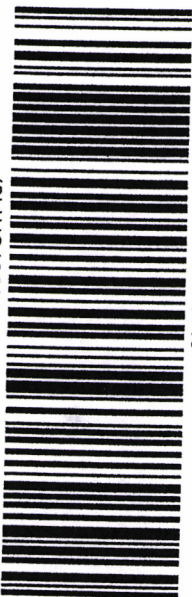
ADI

Ref: case no 22-11608
Day Time
X12
Pcs/Shpt Weight Piece
0.1/0.2 kg 1 / 2

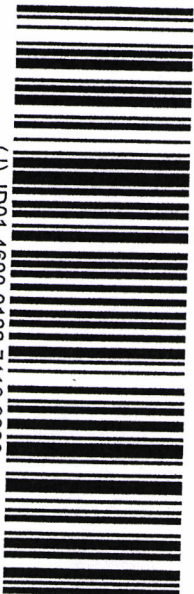


WAYBILL 55 7189 3143

Contents: Documents -
general business



(2L)US19801+38002000



(J) JD01 4600 0122 7418 9888

WAYBILL DOCNot to be attached to package - Hand to Courier
2025-09-26 MYDHL+ /**Shipper :**Weiwei Ji
WEIWEIJI916 Sims Avenue
#07-78408974 SINGAPORE SINGAPORE
SingaporeContact:
+6589396888**Receiver :**the United States Bankruptcy Court, District of Delaware
Clerk, US Bankruptcy Court
WILMINGTON, DE824 North Market Street, 3rd Floor
19801 WILMINGTON Delaware

United States of America

Contact:
Clerk, US Bankruptcy Court
+13022622900**SG-SIN-XSC US-PHL-NJS DENJ****Product Details:****[T] EXPRESS 12:00 (38)**

Features / Services (Service Code)

Payer DetailsAutomated Digital Imaging(PJ)
12:00 Premium(YK)

Freight A/C: Online Payment

Duty A/C:

Taxes A/C:

Shipment Details

Ref: case no 22-11608

Cust Decl Shpt Wgt (UOM) / Dim Wgt (UOM):

0.2 kgPieces
2

Name (in Capital Letters)

Signature

Date (DD.MM.YYYY)

Contents: Documents
- general business

WAYBILL 55 7189 3143

License Plates of pieces in shipment
JD014600012274189888
JD014600012274189889

FROM:
Liu Jing
916 Sims Ave
Singapore 408974
Email: bitcoinstwill@gmail.com

TO: United States Bankruptcy Court, District of Delaware

Attn: Clerk of the Court
824 N. Market Street, 3rd Floor
Wilmington, DE 19801

Re: EMERGENCY MOTION OF LIU JING

— Case No. 22-11068 (KBO)